Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 92-77
Billed Party Preference	)	
for 0+ InterLATA Calls	)	

COMMENTS OF GTE

GTE Service Corporation and its
affiliated GTE domestic telephone
operating companies

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July 7, 1992

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SUMMARY

GTE supports implementing Billed Pary Preference ("BPP"). BPP makes operator services more user friendly. Callers would be able to make all of their operator-assisted calls on a 0+ basis, and could do so with the knowledge that their call would be automatically handled by the OSP with which they wish to do business. It would focus the benefits of competition on the end user.

In order for BPP to be effective, however, it should be required for all 0+ interLATA traffic. Offering BPP for all 0+ interLATA traffic from all phones results in the maximum usage of the BPP system and equipment and spreads the system cost over a greater number of consumers.

There are a number of issues that must be resolved prior to implementing BPP because of the necessary fundamental change to the routing of 0+ interLATA traffic. The complexity of the technical and operational issues involved in BPP implementation must be recognized and sufficient time allowed for issue resolution, system development and network reconfiguration.

GTE provides cost information for providing BPP under the various options discussed in the Order. GTE suggests once the Commission determines whether to implement BPP and the scope of that implementation, the Commission should seek further comment on the cost recovery issues.

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COMMENTS OF GTE

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") offer their comments filed in response to the issues regarding the merits of a "billed party preference" routing methodology for 0+ interLATA payphone traffic and for other types of operator-assisted interLATA traffic presented for consideration in the above referenced Notice of Proposed Rulemaking ("NPRM" or "Notice"), FCC 92-169, released May 8, 1992.

The Commission issued the Notice to consider an alternate routing methodology, known as Billed Party Preference ("BPP") for 0+ interLATA payphone traffic along with other types of operator-assisted interLATA traffic. In this pleading cycle, the Commission is seeking comments on implementing BPP by Local Exchange Carriers ("LECs") and assessing whether BPP will better serve the public interest than current access arrangements for operator-assisted calls. GTE supports the concept of BPP and believes that customers and the public interest will be better served by a BPP arrangement. Of particular concern, however, is the manner BPP will be implemented, the cost of implementation and the recovery of those costs by the LECs.

DISCUSSION

I. General Overview

GTE agrees with the Commission's tentative conclusion that, "in concept, a nationwide system of billed party preference for all 0+ interLATA calls is in the public interest."[1] BPP could benefit the users of operator services by implementing the billed party's choice of carrier without complicating dialing requirements on "0" calls and by redirecting the focus of Operator Service Provider ("OSP") competition for public phone traffic towards the end user and away from the recipient of 0+ commissions.

As the Commission recognizes,[2] BPP would fundamentally change the routing of 0+ calls. Currently, 0+ calls are sent directly to the OSP presubscribed to the originating line. As proposed, 0+ calls would be sent instead to the OSP chosen by the party paying for the call. Thus, each 0+ call would be first sent to the LEC OSS for carrier identification functions, and then to the appropriate OSP.

GTE generally agrees with the Commission's description of current industry plans:

> LECs would implement BPP by loading into the Line Information Data Base ("LIDB") system they have developed a primary and secondary OSP choice for each telephone line. This information would be used for carrier identification purposes on 0+ interLATA collect and third number calls, as well as calls billed to LEC calling cards, which would continue to be either line-number based or in the Revenue Accounting Office ("RAO") format. For such calls,

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1 Notice at ¶13.

2 Notice at ¶9.

> LECs would launch a query from the OSS to a LIDB via common channel signaling ("SS7") to identify the OSP predesignated for the billed line.[3]

A LIDB query would not be necessary on calls made with Interexchange Carrier ("IXC") calling cards if the IXC calling card conforms to either the CIID or the 891 format.[4]

II. Benefits of Billed Party Preference

A. BPP makes operator services more user-friendly

GTE agrees with the tentative conclusion in the Notice that BPP makes operator services more user friendly.[5] Callers would be able to make all of their operator-assisted calls on a 0+ basis, and could do so with the knowledge that their call would be automatically handled by the OSP with which they wish to do business. BPP would preserve all the options that callers currently have with regard to OSP choice.

GTE believes that BPP would result in a substantial benefit to users. Even though users currently may have the ability to access any IXC through dialing carrier assess codes, the Commission is well aware of the confusion and difficulty in this area. BPP would initiate user choice automatically, leaving the "dial around" option of carrier access code dialing available for changes desired for specific calls.

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3 Notice at ¶10, footnotes omitted.

4 Notice at ¶11.

5 Notice at ¶16.

B. BPP will focus competition on the end user

GTE agrees that a major benefit of BPP would be that competition in operator services would be focused toward the end user.[6] Although OSPs currently have been willing to pay substantial commissions to obtain presubscription contracts for public phones, the end user has not been the beneficiary of these payments. BPP would encourage OSPs to provide better services and lower prices to end users, as opposed to paying higher commissions.

III. Implementation Issues

While GTE conceptually agrees that BPP is in the public interest, there are a number of issues that must be resolved prior to implementing BPP. With the necessary fundamental change to the routing of 0+ interLATA traffic, many complex technical and operational issues must be evaluated. The complexity of BPP implementation must be recognized and sufficient time allowed for issue resolution, system development and network reconfiguration.

A. BPP should apply to all interLATA 0+ and 0- traffic

The Notice seeks comment on how BPP should be implemented. The scope of BPP must be determined as a preliminary matter. As the Commission

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6 Notice at ¶19.

recognizes in discussing cost issues, there are several options for providing BPP. The Notice suggests BPP could be provided to: (a) interLATA payphone traffic alone; (b) all interLATA public phone traffic, including traffic from hotel rooms and other aggregator locations; (c) all interLATA 0+ traffic from any phone; and (d) all interLATA 0+ and 0- traffic from any phone. GTE believes that in order for BPP to be effective, BPP must be applied to all traffic by all LECs.

Both options (c) and (d) apply to traffic originating from all phones. These options differ in that option (d) would also apply BPP to 0- traffic. For the most part, the Notice does not elaborate on how BPP would apply to 0- traffic. The discussion and analysis presented in the Notice focuses on 0+ interLATA traffic.

GTE supports implementation of option (d), applying BPP to all interLATA 0+ and 0- traffic. This option would best serve the public interest. First, it would promote the Commission's desire to make operator services less confusing to the consumer. Every phone that a consumer would use, be it public or private, would use the same dialing arrangement for 0+. If BPP were only available on public phones, consumers would be required to distinguish between types of phones to know how to place a call through their preferred 0+ carrier. This would not be substantially different than the present system. Second, this option would generate the highest traffic volumes, which would lower per call costs. If a LEC is required to deploy the technology to provide BPP, it should be deployed ubiquitously. If the technology exists, it should be made available for consumers in all service areas. Offering BPP on all phones results in the maximum usage

of the BPP system and equipment. This would spread the system cost over a greater number of consumers, which, in turn, would lower the unit price to the end user.

B. 0+ carrier assignment should be the same as the preferred 1+ carrier

The Notice recognizes several methods for end users to designate their preferred 0+ carrier. This could be accomplished through balloting or simply by assigning the already established preferred 1+ carrier as the preferred 0+ carrier. In either case, subscribers subsequently desiring change would be permitted to change their preferred carrier for all level 0 calls simply by the contacting the LEC.

GTE strongly opposes balloting subscribers to determine their preferred 0+ carrier. Past experience with equal access balloting shows this method to be time consuming, burdensome and ineffective. Many subscribers did not return equal access ballots. The likelihood that BPP ballots would be returned is probably even lower. In that the customer would probably then be assigned his 1+ carrier by default, the burden of reballoting clearly seems unjustified. Moreover, reballoting would complicate implementation of BPP and add to consumer confusion.

C. Secondary OSP selected by primary OSP

Since many OSPs are regional, a secondary carrier must be designated to permit the completion of calls outside the primary OSP's region. GTE

supports a procedure requiring the primary OSP to designate the secondary OSP for its customers, since it is the primary carrier's responsibility to insure that service can be provided throughout the country to its subscribers. The Commission should require that the primary OSP notify its customers of the secondary OSP. This notice would help to avoid customer confusion. Finally, all secondary OSPs should be required to have a nationwide presence so as to assure that all calls can be handled at least by the secondary OSP.

D. All LECs must implement BPP and Part 68 should be amended

BPP should be required for all LECs. If BPP is implemented for some LECs, but not all, consumer confusion would be inevitable. Consumers expectations that they will be billed by their preferred OSP when dialing a 0+ interLATA call cannot be met without nationwide availability of BPP. This requires implementation by all LECs.

To realize the goal of making operator services more user friendly, Part 68 of the Commission's Rules should be amended to prevent traffic aggregators and payphone providers from using automatic dialing mechanisms to program their phones to "dial around" billed party preference on certain operated-assisted calls.

GTE agrees with the conclusion in the Notice that dialing requirements cannot be simplified if they are not uniform around the country.[7] Without nationwide uniformity, consumers would be forced to determine whether BPP

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7 Notice at ¶31.

routing would be followed at each phone or whether other procedures must be followed to assure that the call is handled by his preferred carrier.

E. GTE estimates a four year implementation period

Until technical issues involving hardware and software requirements, such as call routing and call processing, have been resolved, it would be difficult to establish a date for LEC and IXC implementation of BPP. The normal development cycle for major OSS equipment vendors is two to three years. This assumes all issues are finalized and standards established. GTE would typically require an additional year to deploy and test such software. It is also likely that BPP will require the deployment of additional or replacement operator switches. A three year deployment interval, for such switches, is not unrealistic. As a result, GTE believes a minimum of four years is required to implement BPP.

F. 14 Digit carrier identification is feasible but not desirable

The Notice seeks comment on whether it is feasible or desirable for LECs to perform a fourteen-digit carrier identification screening for LIDB. This would allow OSPs to retain line-based calling cards. Fourteen-digit carrier identification screening cannot be performed with the current LIDB software or the scheduled upgrades. Although it may be possible to create software necessary to perform such screening, GTE questions the benefit of such screening which would serve only to protect the IXC embedded card base.

If LECs were to incur such development costs, the costs would have to be recovered from the carriers benefiting from it. A better and less expensive solution to this issue is for all IXCs desiring to have their card serve as a billing instrument on dialed 0+ interLATA calls to issue cards conforming to the standard 891 format or to adopt the optional CIID format.

G. Double caller information or double operator involvement

The Commission seeks comment on the extent to which callers would have to provide the same information twice or speak with two operators in a BPP system and the extent to which this problem would be alleviated by LEC deployment of SS7 and Automated Alternate Billing Systems ("AABS"). GTE believes that the caller would have to provide the same information twice or speak to two operators only when the LEC and IXC operator systems are not compatible, or for certain call types (i.e., collect and person to person) where vocal information can not be passed.

Given reasonable planning between vendors of both operator systems, consumers should see a "seamless" service that is transparent to the end user, except as identified by call branding. The "problem" is one of communicating information accumulated by the LEC OSS to the IXC OSS. Use of SS7 signaling would alleviate this "problem," but might be a hardship for smaller IXCs that might find it difficult to implement this technology. AABS has no bearing on this issue, since AABS serves only to mechanize the function that would otherwise be performed by a live operator. GTE currently has SS7 functionality on all its OSS, but implementation of BPP would require additional or revised software.

H. BPP could be applied to non-equal access originated calls

GTE believes BPP for all stations is feasible from non-equal access offices if all interLATA 0+ traffic is sent to the LEC OSS. Such calls would be processed by the LEC OSS through LIDB to determine the default preferred carrier as would a call from an equal access office.

I. Commercial credit cards and foreign-issued calling cards

Issues involving handling commercial credit cards and foreign-issued calling cards should be considered in a second phase of BPP implementation. Most LECs have been out of the international calling market for about ten years and do not currently have the ability to process billing using a commercial credit card. The issues involved in implementing these cards are complex and require further consideration into the mechanics of the process. Thus, these issues should not be addressed in this phase of BPP proceeding.

IV. Costs of Implementing BPP

A. Estimated costs and issues

The Notice seeks comment and further information on the total costs of implementing and operating a BPP system for the four options, as discussed above. GTE has attempted to address each option, except option (b). This option involves other aggregators, an area for which GTE has no hard data. Therefore, GTE cannot comment on the cost of implementing and operating such a BPP system. However, it can be said that this cost will fall between the

estimates furnished below and that it will be much closer to a system handling interLATA payphone traffic alone than a system handling all interLATA 0+ and 0- traffic from any phone. When estimating BPP costs for Commission options (c) and (d), GTE concluded these costs to be virtually the same, therefore the estimate that follows is applicable to both options.

All interLATA 0+ and 0- traffic from any phone

GTE considered the following issues (assumptions noted in parenthesis) in the development of a cost estimate for this type of BPP system: (1) end office software enhancements (enhancements will be required to route 0+ interLATA traffic to the LEC OSS while routing 1+ interLATA traffic to the IXC), (2) Data Base Administration ("DBA") labor costs for end office, access tandems, OSS (DBA will be required so that traffic can be routed from IXC to LEC OSS to IXC OSS), (3) trunking end office to LEC OSS (50/50 traffic ratio assumed for interLATA 0+ to intraLATA 0+), (4) operator services switch BPP software enhancements, (5) operator position equipment, (6) new operator training, (7) operator labor, (8) trunking to IXCs (25% of the trunks will terminate in a LATA other than the one in which the LEC OSS resides, currently GTE must return such traffic to the originating LATA in order to route to the appropriate IXC), (9) rehoming leased OSS trunks, (10) software revisions to support systems, and (11) additional/replacement operator service switches. GTE estimates such a BPP system will cost approximately $84 million to implement and $23 million to operate.

InterLATA payphone traffic alone

The issues and assumptions detailed previously also apply to this option. Lesser traffic volumes in this option account for most of the cost differential. GTE estimates such a BPP system will cost approximately $37 million to implement and $1 million to operate.

B. Cost recovery issues

The Notice does not discuss the issue of how BPP costs would be recovered by the LECs. Recovery of incurred LEC costs to implement and operate a nationwide BPP system is a major concern of GTE. GTE suggests that costs associated with BPP be recovered through a charge assessed to OSPs for all 0+ and 0- traffic routed to an OSP. This would directly link cost recovery with cost causer. GTE is concerned, however, that traffic volumes for BPP may not be sufficient to fully recover these costs.

First, the costs and resultant per call charge for BPP may simply be too high to sustain in the market. In this case, OSPs that could not afford the charge would be driven to alternate means of access such as 10XXX dialing. Second, if 0+ Public Domain is ordered during the interim period, substantial numbers of consumers may be trained to use alternative dialing patterns. Upon implementation of BPP, it is uncertain that carriers would want, or be able, to retrain consumers to use 0+ dialing.

GTE suggests the Commission consider alternatives that would minimize this risk. One approach would be to assess the BPP charge on all interLATA 0+ and 0- traffic and all 10XXX+0 traffic. This would insure that only IXC OSPs defray the BPP cost. They would incur a per call charge whenever a LEC performed a carrier identification and routing function on an operated assisted call. In the case of 10XXX+0 traffic this is a switching function, as opposed to the generally accepted definition of BPP. It meets the same purpose, carrier identification and routing. This would result in a larger traffic volume for the application of BPP charges, while at the same time targeting the appropriate industry segment.

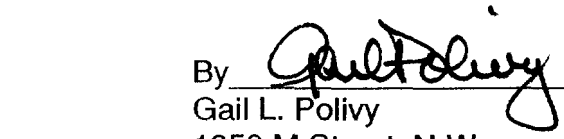
The magnitude of BPP costs coupled with the unresolved issue concerning 0+ Public Domain and the potential for alternative means of access indicate a different cost recovery method may be necessary to ensure LEC recovery of BPP costs. Such an approach would be to fully recover the costs through switched access rates in general. This would have the negative effects of recovering BPP costs from IXCs that do not offer operator services, as well as possibly causing artificial rate increases for services that are subject to competitive vulnerability.

Until the mechanics of implementation and the issues previously described are finalized, GTE is reluctant to endorse a specific method of cost recovery and proposes the Commission consider issuing a further notice of inquiry dealing with the issue of cost recovery. Given the significance of the

costs previously discussed, recovery of LEC investment and expenses necessary to implement and operate BPP is mandatory.

Respectfully submitted,

GTE Service Corporation and its affiliated GTE domestic telephone operating companies

By 

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July 7, 1992

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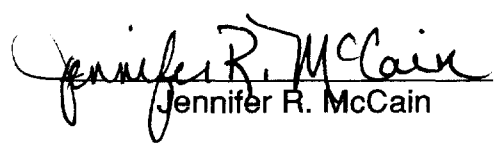
Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Comments Of GTE" have been mailed by first class United States mail, postage prepaid, on the 7th day of July, 1992 to the parties on the attached list:



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